

The Honorable Richard A. Jones

**UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE**

JESSICA BENTON, SHELBY BRYANT,
ANNE MARIE CAVANAUGH, ALYSSA
GARRISON, AND CLARE THOMAS

Plaintiffs,

vs.

CITY OF SEATTLE,

Defendant

Case No. 2:20-cv-01174-RAJ

PRAECIPE TO ATTACH

TO THE CLERK OF THE COURT:

You will please find corrected signature pages for the following:

- Dkt. 32: Declaration of Jessica Benton;
- Dkt. 33: Declaration of Shelby Bryant;
- Dkt. 34: Declaration of Annemarie Cavanaugh;
- Dkt. 35: Declaration of Alyssa Garrison;
- Dkt. 37: Declaration of Marcus Kulik;
- Dkt. 39: Declaration of Chris Rojas; and

PRAECIPE TO ATTACH - 1

2:20-cv-01174-RAJ

SMITH LAW, LLC
4301 NE 4th St.
PO Box 2767
Renton, WA 98059
Tel: (206) 715-4248
Fax: (206) 900-2664

- Dkt. 41: Declaration of Keaton Slansky.

DATED this 6th day of October, 2020.

SMITH LAW, LLC

By /s/ Talitha Hazelton

Talitha Hazelton, WSBA No. 52460

4301 NE 4th St.

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Attorney for Plaintiffs

PRAECIPE TO ATTACH - 2

2:20-cv-01174-RAJ

SMITH LAW, LLC

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CERTIFICATE OF SERVICE

I hereby certify that on October 6, 2020 I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to all counsel of record.

I declare under penalty of perjury under the laws of the United States of America the foregoing is true and correct.

Dated this 6th day of October, 2020 at Seattle, Washington.



J. Talitha Hazelton

CERTIFICATE OF SERVICE

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PO Box 2767
Renton, WA 98059
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1 17. On September 7, 2020, I witnessed via livestream SPD officers respond to a Labor Day march
2 to the Seattle Police Officer's Guild office. Within minutes of arriving at the office, SPD
3 officers converged on protestors, using crowd control weapons.

4 a. The march was very calm before SPD engaged, there were even young children in
5 attendance.

6 18. After observing this response, I do not feel safe attending future protests until SPD is enjoined
7 from using such extreme force against protestors without provocation.

8 19. I recognize that protests will continue to occur as they have been for months. Especially as the
9 election approaches, these protests against police brutality will likely increase. I have identified
10 the following protests that I would like to be able to attend, however I am not sure that I will
11 feel safe enough to participate.

12 a. Recurring Protests:

13 i. Every Day Morning Marches, Monday-Friday at 9:00 AM, various locations

14 ii. Every Day Evening Marches, Monday-Friday at 7:00 PM, various locations

15 iii. Black Indigenous Coalition March, Fridays at 5:00 PM, Capitol Hill

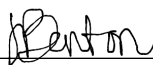
16 b. Upcoming protests can be found at: tinyurl.com/seattleBLMcalendar.

17 20. I fear for my safety in attending other events such as community gatherings and vigils, even if
18 they do not typically garner police presence, because SPD has chosen to treat all of these
19 events as riots.

20 21. Until SPD is enjoined from using chemical agents, projectile guns, or blast balls, I will not feel
21 safe attending protests and will only continue attending protests if I can find and afford
22 protective gear.

23 EXECUTED on this 26th day of September 2020 at Seattle, WA.

24 I declare under penalty of perjury under the laws of the United States and the State of Washington
25 that the foregoing is true and correct.

26 

27 Jessica Benton

28 DECLARATION OF JESSICA BENTON IN SUPPORT OF
MOTION FOR PRELIMINARY INJUNCTION - 3

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Mark

Shelby Bryant

1 16. After observing this response, I do not feel safe attending future protests until SPD is enjoined
2 from using such extreme force against protestors without provocation.

3 17. I recognize that protests will continue to occur as they have been for months. Especially as the
4 election approaches, these protests against police brutality will likely increase. I have identified
5 the following protests that I would like to be able to attend, however I am not sure that I will
6 feel safe enough to participate.

7 a. Recurring Protests:

8 i. Every Day Morning Marches, Monday-Friday at 9:00 AM, various locations

9 ii. Every Day Evening Marches, Monday-Friday at 7:00 PM, various locations

10 iii. Black Indigenous Coalition March, Fridays at 5:00 PM, Capitol Hill

11 b. Upcoming protests can be found at: tinyurl.com/seattleBLMcalendar.

12 18. I also fear for my safety in attending other events such as community gatherings and vigils,
13 even if they do not typically garner police presence, because SPD has chosen to treat all of
14 these events as riots.

15 19. Until SPD is enjoined from using chemical agents, projectile guns, or blast balls, I will not feel
16 safe attending protests.

17 EXECUTED on this 26th day of September 2020 at Seattle, WA.

18 I declare under penalty of perjury under the laws of the United States and the State of Washington
19 that the foregoing is true and correct.

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22 Anne Marie Cavanaugh

1 27. I also fear for my safety in attending other events such as community gatherings and vigils,
2 even if they do not typically garner police presence, because SPD has chosen to treat all of
3 these events as riots.

4 28. Until SPD is enjoined from using chemical agents, projectile guns, or blast balls, I will not feel
5 safe attending protests.

6 EXECUTED on this 26th day of September 2020 at Seattle, WA.

7 I declare under penalty of perjury under the laws of the United States and the State of Washington
8 that the foregoing is true and correct.

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11 _____
12 Alyssa Garrison
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1 3. On September 22, 2020, hours after the Seattle City Council vote to reduce
2 funding of SPD, SPD officers responded to a group of protestors outside of the
3 East Precinct on 12th Ave and Pine. I recorded a one minute and eight second
4 video of this incident, which can be viewed on Twitter here:

5
6 <https://twitter.com/MarcusKulik/status/1308671251594977280?s=20>.

7 a. At 0:08, a blast ball is deployed.

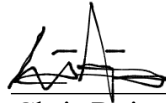
8 EXECUTED on this 23rd day of September 2020 at Seattle, WA.

9 I declare under penalty of perjury under the laws of the United States and the State
10 of Washington that the foregoing is true and correct.
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14 Marcus Kulik
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1 I declare under penalty of perjury under the laws of the United States and the State
2 of Washington that the foregoing is true and correct.

3
4 
5 Chris Rojas

1 6. Protective gear is absolutely necessary to attend any protest because of SPD's misuse of crowd
2 control weapons.

3 EXECUTED on this 27th day of September 2020 at Seattle, WA.

4 I declare under penalty of perjury under the laws of the United States and the State of Washington
5 that the foregoing is true and correct.

6
7 

8 Keaton Slansky